



Worker Justice Center of New York

January 6, 2021

Hon. Christian F. Hummel, U.S.M.J.
James T. Foley U.S. Courthouse
445 Broadway, Room 441
Albany, NY 12207
Via ECF

Re: *Yeend et al. v. Akima Global Services, LLC*, 1:20-cv-01281-TJM-CFH

Dear Judge Hummel:

I write to request a one-week extension to Plaintiffs' deadline to file a reply in support of the motion to remand. Defendant's opposition papers, filed on January 4, included two new declarations and over 30 pages of new purported evidence, which were not included in the original removal submissions and of which Defendant asks this Court to take judicial notice. (*See* Dkts. 21, 21-2, 21-2, 21-3, 21-4.) Pursuant to Local Rule 7.1(a)(1), the current deadline for reply is January 11; we respectfully request that it be extended to January 18 to enable us to review the new materials and arguments submitted by Defendant and consider their significance.

Defendant does not consent to the extension but has not provided any explanation. We are unaware of any prejudice that the extension would cause to Defendant. The extension does not affect any other deadlines in the case.

Respectfully submitted,

s/ Maureen Hussain

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